

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

Santana Bryson and Joshua Bryson,)
as Administrators of the Estate of)
C.Z.B., and as surviving parents of)
C.Z.B., a deceased minor,) Case No. 2:22-CV-017-RWS
)
Plaintiffs,) JURY TRIAL DEMANDED
)
v.)
)
Rough Country, LLC,)
)
Defendant.)

[PROPOSED] CONSENT PRE-TRIAL SCHEDULING ORDER

The parties agree, and it is hereby ordered that the following Order controls the deadlines for the following pre-trial matters in the above-captioned case:

1.

The parties must exchange final exhibit lists and exchange exhibits by no later than **June 16, 2025**. **Objections to exhibits must be filed with the Court by June 30, 2025**. As discussed at the pretrial conference, rebuttal exhibits, impeachment exhibits, and demonstrative aids are exempt from this exhibit exchange. However, if the demonstrative aid contains an animation or other new material, it must be exchanged one week before trial begins. All other demonstrative aids must be shown to the opposing party before being presented at trial.

2.

The parties must exchange deposition designations for witnesses whose testimony will be presented at trial using video deposition by no later than **June 16, 2025**. The parties must exchange counter-designations by no later than **June 23, 2025**. Any objections to the deposition designations shall be filed in writing no later than **June 30, 2025**.

3.

Trial depositions for the preservation of evidence may be taken up to 30 days before trial without leave of Court. Absent agreement by the parties, trial preservation depositions may not be taken in the 30 days before trial without express leave of Court. For trial depositions for the preservation of evidence taken after the entry of this Order, the parties shall exchange designations, counter-designations, and objections sufficiently early to ensure submission to the Court by **July 15, 2025**.

SO ORDERED this _____ day of _____, 2025.

Honorable Richard W. Story
United States District Court Judge

PREPARED AND SUBMITTED BY: **CONSENTED TO BY:**

CANNELLA SNYDER LLC

/s/ Tedra L. Cannella

Tedra L. Cannella
Georgia Bar No. 881085
Robert H. Snyder, Jr.
Georgia Bar No. 404522
Devin L. Mashman
Georgia Bar No. 257588
315 W Ponce de Leon Ave, Suite 885
Decatur, GA 30030
Phone: 404-800-4828
Fax: 404-393-0365
tedra@cannellasnyder.com
rob@cannellasnyder.com
devin@cannelllasnyder.com
Attorneys for Plaintiffs

WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL

/s/ Aaron B. Chausmer

Richard H. Hill
Georgia Bar No. 354425
Claire C. Murray
Georgia Bar No. 225885
Lindsay G. Ferguson
Georgia Bar No. 140970
Aaron B. Chausmer
Georgia Bar No. 119998
3344 Peachtree Road, N.E.
Suite 2400
Atlanta, GA 30326
Phone: 404-876-2700
Fax: 404-875-9433
rhill@wwhgd.com
cmurray@wwhgd.com
lferguson@wwhgd.com
achausmer@wwhgd.com
Attorneys for Defendant Rough Country, LLC

RULE 7.1D CERTIFICATE OF TYPE, FORMAT AND FONT SIZE

Pursuant to Local Rule 7.1D of the United States District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court complies with Local Rule 5.1 in that it was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Respectfully submitted, this 19th day of May, 2025.

CANNELLA SNYDER LLC

/s/ *Tedra L. Cannella*

Tedra L. Cannella
Georgia Bar No. 881085
Robert H. Snyder, Jr.
Georgia Bar No. 404522
Devin L. Mashman
Georgia Bar No. 257588

Attorneys for Plaintiffs

315 W. Ponce de Leon Ave.
Suite 885
Decatur, Georgia 30030
Phone: 404-800-4828
Fax: 404-393-0365

CERTIFICATE OF SERVICE

I hereby certify that the foregoing *PROPOSED CONSENT PRE-TRIAL SCHEDULING ORDER* was electronically filed with the Clerk of Court via CM/ECF, which will automatically serve the following attorneys of record:

Richard H. Hill
Claire C. Murray
Lindsay G. Ferguson
Aaron B. Chausmer
3344 Peachtree Road, N.E.
Suite 2400
Atlanta, GA 30326
rhill@wwhgd.com
cmurray@wwhgd.com
lferguson@wwhgd.com
achausmer@wwhgd.com

This 19th day of May, 2025.

CANNELLA SNYDER LLC

/s/ *Tedra L. Cannella*
Tedra L. Cannella
Georgia Bar No. 881085
Attorney for Plaintiffs